

1 KARL O. RILEY
2 Nevada Bar No. 12077
3 COZEN O'CONNOR
3753 Howard Hughes Pkwy., Suite 200
Las Vegas, NV 89169
4 Telephone: 702-470-2330
Facsimile: 702-470-2370
5 Email: koriley@cozen.com

6 CASEY GRIFFITH
Texas Bar No. 24036687 (Admitted *Pro Hac Vice*)
7 MICHAEL BARBEE
Texas Bar No. 24082656 (Admitted *Pro Hac Vice*)
8 MAEGHAN WHITEHEAD
Texas Bar No. 24075270 (Admitted *Pro Hac Vice*)
9 GRIFFITH BARBEE PLLC
One Arts Plaza
10 1722 Routh Street, Suite 710
Dallas, TX 75201
11 Telephone: 214-446-6020
Facsimile: 214-446-6021
12 Email: casey.griffith@g Griffithbarbee.com
Email: michael.barbee@g Griffithbarbee.com
13 Email: maeghan.whitehead@g Griffithbarbee.com

14 Attorneys for Defendant and Counterclaim-
Plaintiff Sayers Construction, LLC

15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 UNITED STATES OF AMERICA, For
the Use of Benefit of SOURCE
18 HELICOPTERS, DIVISION OF
ROGERS HELICOPTERS, INC., a
California corporation,

20 Plaintiff,

21 vs.

22 SAYERS CONSTRUCTION, LLC, a
Texas limited liability company
23 PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a
24 PENNSYLVANIA corporation; and
DOES I-V and ROE CORPORATIONS I-
V,
25

26 Defendants.
27

28 Case No.: 2:19-cv-1602-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINES OF THE
STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER
(Sixth Request)**

Use-Plaintiff, Source Helicopters, Division of Rogers Helicopters, Inc. (“Plaintiff” or “Rogers”), and Defendants, Sayers Construction, LLC (“Sayers”) and Philadelphia Indemnity Insurance Company (“PIIC”) by and through their attorneys, hereby stipulate and request the Court extend certain dates as contained in the *Stipulation and Order to Extend Deadlines of the Stipulated Discovery Plan and Scheduling Order (Fifth Request)*, filed on March 4, 2021 [Dkt. # 61] (“Fifth Extension of Scheduling Order”). This is the sixth stipulation to extend deadlines in this matter. In support of this stipulation and request, the following is provided, pursuant to LR IA 6-1 and LR 26-4:

The deadline for filing dispositive motions in this action is currently set for Monday, May 24, 2021. Counsel for Sayers has a separate matter set for trial on Thursday, May 20, 2021, to which counsel must travel. This trial date was set following the parties' submission of the Fifth Extension of Scheduling Order in this matter, and it was unclear whether the trial would proceed during the pendency of various pre-trial motions. Those pre-trial motions were decided on May 12, 2021, and trial is proceeding on May 20, 2021. The trial has required an extensive amount of preparation from Sayers's counsel that has taken away time from the adequate preparation of dispositive motion briefing in the present matter. Counsel for the parties conferred on May 14 and 17, 2021, and are in agreement on the requested extension.

In consideration of the above, the parties submit good cause is present for their request for an extension of the current deadline for filing dispositive motions. The parties propose the following deadline extensions:

- The current May 24, 2021 deadline for filing dispositive motions shall be extended to **Friday, May 28, 2021**.
- The current June 23, 2021 deadline for filing the joint pretrial order shall be extended to not later than thirty (30) days after the above-referenced extended May 28, 2021 date set for filing dispositive motions, i.e., **June 27, 2021**. Pursuant to L.R. 26-1(b)(5), in

1 the event dispositive motions are filed, the date for filing the joint pretrial order shall
2 be suspended until thirty (30) days after decision of the dispositive motions or further
3 order of the Court.

4 \\\\

5 \\\\

6 \\\\

7 \\\\

8 \\\\

9 \\\\

10 \\\\

11 \\\\

12 \\\\

13 \\\\

14 \\\\

15 \\\\

16 \\\\

17 \\\\

18 \\\\

19 \\\\

20 \\\\

21 \\\\

22 \\\\

23 \\\\

24 \\\\

25 \\\\

26 \\\\

27 \\\\

28 \\\\

1 **GRIFFITH BARBEE, PLLC**

2 By /s/ Maeghan Whitehead
3 Casey Griffith, Esq. (pro hac vice)
4 Maeghan Whitehead, Esq. (pro hac vice)
5 Dallas Flick, Esq. (pro hac vice pending)
6 One Arts Plaza
7 1722 Routh Street, Suite 710
8 Dallas, Texas 75201
9 Ph. (214) 446-6020; fax (214) 446-6021
10 Email: casey.griffith@griffithbarbee.com
11 Email: maeghan.whitehead@griffithbarbee.com

12 Karl O. Riley (NSBN 12077)
13 Cozen O'Connor
14 3753 Howard Hughes Pkwy, Ste. 200
15 Las Vegas, Nevada 89169
16 Ph. (702) 470-2330; fax (702) 470-2370
17 Email: koriley@cozen.com
18 Attorneys for Defendant Sayers Construction,
19 LLC

20 **Dated: May 17, 2021**

21 **THE FAUX LAW GROUP**

22 By /s/ Willi Siepmann
23 Kurt C. Faux, Esq. (NSBN 3407)
24 Willi H. Siepmann, Esq. (NSBN 2478)
25 Jordan F. Faux, Esq. (NSBN 12205)
26 2625 North Green Valley Parkway, #100
27 Henderson, Nevada 89014
28 Ph.(702) 458-5790; Fax: (702) 458-5794
29 Email: kfaux@fauxlaw.com
30 Attorneys for Philadelphia Indemnity
31 Insurance Company
32 **Dated: May 17, 2021**

33 **CLARK HILL PLLC**

34 By /s/ D. Creighton Sebra
35 D. Creighton Sebra, Esq (pro hac vice)
36 1055 West Seventh Street, 24th Floor
37 Los Angeles, California 90017
38 Ph. (213) 891-9100; fax (213) 488-1178
39 Email: CSebra@ClarkHill.com

40 Bert Wuester Jr., Esq. (NSBN 5556)
41 CLARK HILL PLLC
42 3800 Howard Hughes Parkway, Suite 500
43 Las Vegas, Nevada 89169
44 PH. (702) 862-8300; fax (702) 862-8400
45 Email: bwuester@clarkhill.com
46 Attorneys for Use-Plaintiff

47 **Dated: May 17, 2021**

48 **IT IS SO ORDERED:**

49 
50 Layna L. Zouchah
51 U.S. MAGISTRATE JUDGE

52 **DATED: May 18, 2021**